

**ACETO CORPORATION**

4 Tri Harbor Court  
Port Washington, NY 11050  
Tel: (516) 627 6000  
Fax: (516) 627 6093  
www.aceto.com

March 7, 2014

**Via Email and UPS Mail**

Ms. Bonnie Hriczko  
Removal Action Branch  
U.S. Environmental Protection Agency, Region II  
2890 Woodbridge Avenue, MS-211  
Edison, New Jersey 08837

Re: **Response of Aceto Corporation to the Request for Information pursuant to Section 104(e) of CERCLA relating to the Superior Barrel and Drum ("SBD") Site Elk, Gloucester County, New Jersey**

Dear Ms. Hriczko:

Enclosed please find a response to the Request for Information pursuant to Section 104(e) of CERCLA relating to the Superior Barrel and Drum ("SBD") Site located in Elk, New Jersey, received by the Aceto Corporation ("Aceto") on January 4, 2014. As you know, the United States Environmental Protection Agency (the "Agency") granted the Company an extension of thirty (30) days, to March 16, 2014, in which to provide a response to this Request for Information.

To the best of our knowledge following reasonable inquiry, Aceto has never conducted any business transactions with SBD for the disposal, treatment, or storage of any drums or other containers. It is our understanding from the nexus documents (i.e., four photographs) provided by the Agency and attached to the response as Exhibit 1 that a single drum with an Aceto label came to be located at the SBD Site. Given that Aceto has never conducted any business with SBD, the most reasonable explanation for the presence of this drum is that it was sent there (directly or indirectly) by one of Aceto's customers.

The label on the drum in the photographs provided by the Agency identifies the contents of the drum as Benzophenone Flake. Attached to the response as Exhibit 2 is a list of customers to whom the Company sold Benzophenone Flake. As is evident from the "Port of Destination" marked on the label, this drum and its contents were sent to an Aceto customer located in



Ms. Bonnie Hriczko  
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Chicago, Illinois. Exhibit 2 identifies two customers located in Chicago to whom Aceto sold this product.

Liability for cleanup costs under the Comprehensive Environmental Response, Compensation, and Liability Act, 42 U.S.C. § 9601 et seq. ("CERCLA"), extends to four classes of "covered persons":

- (1) the owner and operator of a facility at which a release or threatened release of a hazardous substance exists;
- (2) the owner or operator of such a facility any time in the past when hazardous substances were disposed of;
- (3) any person or entity who "arranged for" the treatment or disposal of a hazardous substance at the facility; and
- (4) any person who transported hazardous substances to the facility.

Aceto never owned or operated the SBD Site, never transported hazardous substances for disposal or treatment at the SBD Site, and never arranged for the treatment or disposal of a hazardous substance at the SBD Site. Therefore, since it falls under none of the four classes of "covered persons," Aceto is not a liable party under CERCLA.

An argument could be made that Aceto is an "arranger" because the drum came to be located at the SBD Site. This argument fails, however, because Aceto sold a useful product (i.e. Benzophenone Flake) to its customer, and did not "arrange for" the disposal of a hazardous substance at the facility. The United States Supreme Court has held that an entity must have an intent to dispose of a hazardous substance in order to be held liable as an arranger. Burlington N. & Santa Fe Ry. Co. v. United States, 129 S. Ct. 1870 (2009). A person may be held liable for cleanup costs as an "arranger" only if the material in question constitutes waste rather than a useful product. California Dept. of Toxic Substances Control v. Alco Pacific, Inc., 508 F.3d 930 (9th Cir. 2007). The Company sold Benzophenone Flake to its customer as a useful product in the normal course of business, and did not intend to dispose of it as waste. As such, Aceto cannot be held liable for cleanup costs as an arranger under CERCLA.

The photographs of the drum at the SBD Site show that it was not filled with Benzophenone Flake, but rather contained a small, portable gasoline container and hosing. Thus, there is no evidence that the drum contained a hazardous substance when it arrived at the SBD Site.

In light of the foregoing, Aceto is not a "covered person" under CERCLA and, therefore, is not liable for the costs of remediation.

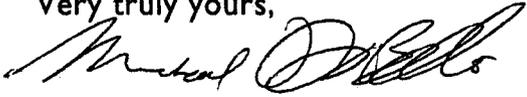
If you have any questions, please do not hesitate to contact me.

Ms. Bonnie Hriczko

March 7, 2014

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Very truly yours,

A handwritten signature in black ink, appearing to read "Michael DiBello". The signature is fluid and cursive, with the first name "Michael" written in a larger, more prominent script than the last name "DiBello".

Michael DiBello

VP, Associate General Counsel – Regulatory

(516) 478 – 9546

Enclosures

cc: Mr. William Tucker, Esq., USEPA

Response of Aceto Corporation  
to the Request for Information pursuant  
to Section 104(e) of CERCLA  
Relating to the Superior Barrel and Drum ("SBD") Site,  
Elk, Gloucester County, New Jersey

**REQUEST FOR INFORMATION**

**General Information about the Company**

1. a. State the correct legal name of the Company.

**RESPONSE:**

**Aceto Corporation.**

- b. Identify the legal status of the Company (corporation, partnership, specify if other) and the state in which the Company was organized.

**RESPONSE:**

**The Company was incorporated in the State of New York in 1947.**

- c. State the name(s) and address(es) of the officer(s) of the Company.

**RESPONSE:**

<b>Name</b>	<b>Title</b>	<b>Business Address</b>	<b>Work Phone</b>
Nicholas Shackley	Senior Vice President	4 Tri Harbor Court Port Washington, NY 11050	516-478-9545
Steven Rogers	General Counsel	4 Tri Harbor Court Port Washington, NY 11050	516-478-9514
Salvatore J. Gucionne	President and CEO	4 Tri Harbor Court	516-478-9518

		Port Washington, NY 11050	
Doug A. Roth	CFO	4 Tri Harbor Court Port Washington, NY 11050	516-478- 9540
Frank DeBenedittis	First V.P.	4 Tri Harbor Court Port Washington, NY 11050	516-478- 9527

If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify th

- d. If the Company has subsidiaries or affiliates, or is a subsidiary of another organization, identify these related companies and state the name(s) and address(es) of the officer(s) of those organizations. Provide the same information for any further parent/subsidiary relationships.

**RESPONSE:**

See attached Exhibit 3 for a listing of Aceto subsidiaries and officers. Aceto Corporation is the ultimate parent company of all subsidiaries noted in Exhibit 3.

- e. If the Company is a successor to, or has been succeeded by, another, identify such other company and provide the same information requested above for the predecessor or successor company.

**RESPONSE:**

N/A

- f. If the Company transacted business with SBD in the name of an entity not already disclosed, give the name of such entity and state its relationship to the Company.

**RESPONSE:**

**The Company has not transacted business with SBD, nor has it transacted business with SBD in the name of another entity.**

2. a. Describe in detail the nature of your Company's business during the years 1974 to the present. If the nature of the business has not been constant, describe the

changes that have occurred, including any name changes, and when they occurred.

**RESPONSE:**

The Company, founded in 1947, is an international marketing, sales and distribution company organized into three business segments: Human Health, Pharmaceutical Ingredients and Performance Chemicals. The Company operates in nine countries, allowing it to source and supply products on a global basis.

- b. Describe your Company's operations from 1974 to the present and indentify all chemicals used or produced as a result of your Company's operations during that period, including any chemical substances used to clean equipment or machinery and the nature and chemical constituents of all waste streams and their disposition.

**RESPONSE:**

Aceto functions as a virtual manufacturing company distributing more than 1,100 chemical compounds used principally as raw materials or finished products in the pharmaceutical, agricultural, colors, inks, and general chemical industries. The identity of chemicals has varied over the years, therefore, the Company is not able to provide a list of all such chemicals distributed during the 40 years it has been in business. Also, Aceto is a distribution company and, as such, does not have chemical waste streams.

**Company's Relationship to Superior Barrel and Drum ("SBD")**

3. a. State whether the Company or any Company facility conducted any business transactions with SBD for the disposal, treatment, or storage of any barrels, drums, or other containers (hereinafter collectively referred to as "Containers").

**RESPONSE:**

To our knowledge, the Company has never conducted any business transactions with SBD for the disposal, treatment, or storage of any Containers. It is our understanding from the photographs provided by the United States Environmental Protection Agency (the "Agency") attached hereto as Exhibit 1 that a single drum with an Aceto label came to be located at the SBD Site. Since the Company has never had any dealings with SBD, the most practical explanation for the presence of drum at the SBD Site is that it was sent there, possibly by one of the Company's customers, after the Company sold its product to the customer.

**The labeling on the drum identifies the contents as Benzophenone Flake. Attached hereto as Exhibit 2 is a list of customers to whom the Company sold Benzophenone Flake. According to the "Port of Destination" marked on the label, this drum was sent to a customer in Chicago, Illinois. Exhibit 2 identifies two customers located in Chicago to whom the Company sold this product.**

- b. If so, identify each such facility and describe the relationship between the Company and SBD, including the nature of services rendered or products sold to the Company.

**RESPONSE:**

**See response to Question 3(a).**

- c. Provide copies of any contracts or agreements between the Company and SBD.

**RESPONSE:**

**See response to Question 3(a).**

- 4. a. For each facility identified in Question 3, state the nature of the operations conducted at the facility, including the time period in which the facility operated.

**RESPONSE:**

**See response to Question 3(a).**

- b. State the name, address, and current RCRA Identification Number of each facility.

**RESPONSE:**

**See response to Question 3(a).**

- 5. For each transaction between the Company and SBD, provide the following information, which may be provided in tabular format.

- a. Identify the specific dates of each transaction and the facility involved with each transaction. Where an exact date cannot be provided for a transaction, provide an approximation by month and year.

**RESPONSE:**

**See response to Question 3(a).**

- b. Identify the number of Containers that were the subject of each such transaction.

**RESPONSE:**

See response to Question 3(a).

- c. Generically describe each Container that was the subject of each such transaction, including the Container capacity and type (example: 55-gallon closed head steel drums, etc.).

**RESPONSE:**

See response to Question 3(a).

- d. Identify the intended purpose and nature of each such transaction (example: Company products sold to SBD, Company waste disposed of by SBD, Company products purchased from SBD, Services rendered to or from the Company to or from SBD, etc.).

**RESPONSE:**

See response to Question 3(a).

- e. State whether each Container that was the subject of the transaction contained any substance(s) at the time of the transaction. As to each Container that contained any substance:

**RESPONSE:**

See response to Question 3(a).

- (1) Identify each such substance, including its specific chemical constituent(s), physical state, quantity by volume and weight, and other characteristics; and

**RESPONSE:**

See response to Question 3(a).

- (2) Provide all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

**RESPONSE:**

See response to Question 3(a).

6. Provide copies of all documents relating in any way to each transaction, including copies of delivery receipts, invoices, or payment devices.

**RESPONSE:**

**See response to Question 3(a).**

7. Identify all persons who might have knowledge of the transaction or who had any responsibility regarding the transaction.

**RESPONSE:**

**See response to Question 3(a).**

8. If you contend that any Container identified in response to Question 5, above, did not contain any substance at the time of the transaction, state whether such Container had previously been used by the Company to contain any substance, and if so:
  - a. Identify all substances previously contained within such Container, including its specific chemical constituent(s), physical state, and other characteristic(s); and

**RESPONSE:**

**See response to Question 3(a).**

- b. Provide as to such substance(s), all written analyses that may have been generated for each such substance or which may be in the custody or control of the Company and all material safety data sheets, if any, relating to each such substance.

**RESPONSE:**

**See response to Question 3(a).**

9. Describe in detail any treatment of any Container that may have been performed by or on behalf of the Company prior to the time that the Container was transferred from the Company, including any process or procedure by which the Container was emptied or cleaned.

**RESPONSE:**

**See response to Question 3(a).**

10. If you sent any Container by means of any third party transporter, identify each such transporter, including the name and address of such transporter, and identify in which of the transactions such transporter acted.

**RESPONSE:**

See response to Question 3(a).

11. Identify each person consulted in responding to these questions and all questions on which he or she was consulted.

**RESPONSE:**

The following Aceto Corporation employees and agents were consulted in responding to this Request for Information:

- a) **James Dillon, Aceto Consultant – Environmental & Regulatory Affairs**  
Address: 123 Vanderburgh Ave. Rutherford, NJ 07070  
Telephone: (201) 870-2881  
James Dillon was the Director of Environmental and Regulatory Affairs at Aceto from September 1993 to October 2005, and has been currently retained as Consultant – Environmental & Regulatory since 2005.
- b) **Amy Rogers, Assistant Vice President/Director of Transportation**  
Address: 4 Tri Harbor Court Port Washington, NY 11050  
Telephone: (516) 478-9581  
Amy Rogers has been with Aceto for 22 years and responsible for transportation, logistics and warehousing.
- c) **Suhey Francisco, Sr. Regulatory Affairs Specialist**  
Address: 4 Tri Harbor Court Port Washington, NY 11050  
Telephone: (516) 478-9596  
Suhey Francisco has been with Aceto for 6 years and is responsible for regulatory compliance and Environmental Health & Safety.
- d) **Roy Goodman, Vice President, Performance Chemicals**  
Address: 4 Tri Harbor Court Port Washington, NY 11050  
Telephone: (516) 478-9520  
Roy Goodman has been with Aceto for 37 years and is a senior manager in the Performance Chemicals department responsible for sales of the subject product – Benzophenone Flake.
- e) **Fred Trudwig, Jr., Sr. Technical Manager – AG. Protection Product**  
Address: 4 Tri Harbor Court Port Washington, NY 11050  
Telephone: (516) 478-5569

**Fred Trudwig, Jr. has been with Aceto for 10 years and was responsible for regulatory compliance and Environmental Health & Safety from 2003 to 2007. In 2007, he transferred to the Agricultural Products group where he is currently the Sr. Technical Manager for Aceto's herbicides, fungicides and insecticides products.**

**f) Michael DiBello, Esq., VP, Assistant General Counsel – Regulatory**

**Address: 4 Tri Harbor Court Port Washington, NY 11050**

**Telephone: (516) 478-9546**

**Michael DiBello has been with Aceto since 2012 as corporate counsel and head of Global Regulatory and QA, and responsible for environmental health and safety.**

12. Identify any other person or entity (e.g., individual, company, partnership, etc.) having knowledge of the facts relating to the questions which are the subject of this inquiry. For each such person that you identify, provide the name, address, and telephone number of that person, and the basis of your belief that he or she has such knowledge. For the past and present employees, include their job title(s) and a description of the responsibilities.

**RESPONSE:**

**The Company is not aware of any other person or entity having knowledge of the facts relating to the questions which are the subject of this inquiry.**

13. Supply any additional information or documents that may be relevant or useful to identify other sources who disposed of or transported Containers to the Site.

**RESPONSE:**

**The Company has no further information or documents that may be relevant or useful to identify other sources who may have disposed of or transported Containers to the SBD Site.**

**CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION**  
Superior Barrel and Drum Site, Elk, Gloucester County, New Jersey

State of NEW YORK :  
County of NASSAU :

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

MICHAEL DIBELLO  
NAME (print or type)

VP, ASSOCIATE GENERAL COUNSEL-Regulatory  
TITLE (print or type)

  
SIGNATURE

Sworn to before me this 7 day of  
MARCH 2014

  
Notary Public

JULIET GRIFFITH  
NOTARY PUBLIC-STATE OF NEW YORK  
No: 01GR6270741  
Qualified in Nassau County  
My Commission Expires October 22, 2016



Label with illegible text, possibly a manufacturer's or product's label.

1266

2013 10 07

EXHIBIT 1



2013 10 07



2013 10 07

detailed information  
recommended that you consult the Material Safety Data

119-61-9

No information available

No information available

EXHIBIT 2  
**PO-LOT CORRELATION**

Warehouse Range: To: ZZZZZZZZZZ  
 Product Range: To: ZZZZZZZZZZ  
 PO Range: PO0024092 To: PO0024092  
 Lot/Batch Range: To: ZZZZZZZZZZ  
 Customer # Range: To: ZZZZZZZZZZ  
 Transaction Dt Range: 1/1/2011 To: 12/31/2014

<u>Whse</u>	<u>Date</u>	<u>Transaction#</u>	<u>Transaction#</u>	<u>Customer</u>	<u>Ship to State</u>	<u>Status</u>	<u>Piece Qty</u>	<u>Packing</u>	<u>Quantity</u>	<u>UOM</u>	<u>Lot Cost</u>	<u>Value</u>
<b>Item: 3603900 BENZOPHENONE FLAKE</b>												
<b>PO0024092 ACETO SHANGHAI LTD.</b>												
<b>12041031</b>												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	6/11/12	SHP0105784	SO0100683	CHARKIT CHEMICAL CORPORATI	IL	A	-40.00	200LD	-8,000.0000	LB	1.69	-13,501.99
<b>12041032</b>												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	6/11/12	SHP0105784	SO0100683	CHARKIT CHEMICAL CORPORATI	IL	A	-40.00	200LD	-8,000.0000	LB	1.69	-13,501.99
<b>12041033</b>												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	6/5/12	SHP0105637	SO0100854	3M COMPANY	IL	A	-12.00	200LD	-2,400.0000	LB	1.69	-4,050.60
580	6/11/12	SHP0105784	SO0100683	CHARKIT CHEMICAL CORPORATI	IL	A	-28.00	200LD	-5,600.0000	LB	1.69	-9,451.39
<b>12041034</b>												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	6/5/12	SHP0105732	SO0104189	MILLER INK TECHNOLOGY, INC.	CA	A	-2.00	200LD	-400.0000	LB	1.69	-675.10
580	6/5/12	SHP0105637	SO0100854	3M COMPANY	IL	A	-36.00	200LD	-7,200.0000	LB	1.69	-12,151.79
580	7/3/12	SHP0106627	SO0104920	VALSPAR SOURCING, INC.	MD	A	-2.00	200LD	-400.0000	LB	1.69	-675.10
<b>12041035</b>												
580	5/31/12	REC0027025				A	40.00	200LD	8,000.0000	LB	1.69	13,501.99
580	7/3/12	SHP0106627	SO0104920	VALSPAR SOURCING, INC.	MD	A	-9.00	200LD	-1,800.0000	LB	1.69	-3,037.95
580	7/12/12	SHP0106998	SO0105032	VALSPAR SOURCING, INC.	MD	A	-11.00	200LD	-2,200.0000	LB	1.69	-3,713.05
580	7/26/12	SHP0107474	SO0105121	VALSPAR SOURCING, INC.	NC	A	-10.00	200LD	-2,000.0000	LB	1.69	-3,375.50
580	9/4/12	SHP0108959	SO0105198	3M COMPANY	IL	A	-10.00	200LD	-2,000.0000	LB	1.69	-3,375.50
		Total PO Qty in Inventory		PO0024092			0.00		0.0000	LB		0.00
		Total Item:		3603900			0.00		0.0000	LB		0.00
		Grand Total							0.0000	LB		0.00

**ACETO CORPORATION**

**SUBSIDIARIES AND OFFICERS**

**2014**

**DOMESTIC**

<b>COMPANY</b>	<b>OFFICERS</b>	<b>TITLE</b>	<b>HOME ADDRESS</b>	<b>HOME PHONE</b>
<b>Aceto Corporation</b>	Albert Eilender	Chairman & CEO	12714 Deacon's Place, Lakewood Ranch, FL, 34202	941-586-5023
4 Tri Harbor Court	Salvatore Guccione	President & COO	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
Port Washington, NY 11050	Douglas Roth	Sr. VP-CFO, Asst. Secretary, Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000	Steven S. Rogers	Sr. VP, Secretary	11 Glenwood Rd., Tenafly, NJ 07670	201-541-6611
<b>Aceto Agricultural Chemicals Corp.</b>	Salvatore Guccione	Chairman	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Steven S. Rogers	Sr. VP, Secretary	11 Glenwood Rd., Tenafly, NJ 07670	201-541-6611
Port Washington, NY 11050	Douglas Roth	Secretary, Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000				
<b>Aceto Pharma Corp.</b>	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Frank DeBenedittis	1st Vice President	40 Somerset Place, Syosset, NY 11791	516-921-2462
Port Washington, NY 11050	Douglas Roth	Treasurer & Secretary	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000				
<b>Aceto Realty LLC</b>	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Steven S. Rogers	Vice President & Secretary	11 Glenwood Rd., Tenafly, NJ 07670	201-541-6611
Port Washington, NY 11050	Douglas Roth	Vice President & Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000				
<b>Acci Realty Corp.</b>	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Douglas Roth	Secretary, Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
Port Washington, NY 11050				
516-627-6000				
<b>Arsynco, Inc.</b>	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
4 Tri Harbor Court	Edward Kelly	Asst. Treasurer	24 Ryder Ave, Dix Hills, NY 11746	516-478-9512
Port Washington, NY 11050	Douglas Roth	Secretary, Treasurer	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
516-627-6000				
<b>Canegrass LLC</b>	Michael Feinman	Manager	6934 Woodmore Terrace, Lakewood Ranch, FL, 34202	631-374-4462
Member Name:	Terry Kippley	Manager	360 Scudder Avenue, Northport, NY 11768	516-478-9537
Aceto Agricultural Chemicals Corp. -30%	Bharat Dutia	Manager	Not Aceto Employees	
United Phosphorus Inc. - 70%	Beth Sears	Manager	Not Aceto Employees	
4 Tri Harbor Court				
Port Washington, NY 11050				
516-627-6000				
<b>Rising Pharmaceuticals, Inc.</b>	Salvatore Guccione	CEO	6 Ramkay Drive, Fairfield, NJ 07004	201-206-1439
(Name change effective Jan 3, 2011)	Satish Srinivasan	COO & President	42 Lockwood Drive, Princeton, NJ 08540	201-961-9000
3 Pearl Ct,	Frank DeBenedittis	Vice President	40 Somerset Place, Syosset, NY 11791	516-921-2462
Allendale, NJ 07401	Douglas Roth	VP, Treasurer & Secretary	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
(201) 961-9000				

## FOREIGN

COMPANY/ADDRESS	OFFICERS	TITLE	HOME ADDRESS	HOME PHONE
Aceto Agricultural Chemicals Corporation Ltd.	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-208-1439
Champion Allwoods Ltd.	Grace Gillardd	Secretary	2 Chinston Close, AwiliscombeHoniton, Devon EX14 3 GBUnited Kingdom	011-441-404-44625
2nd Fl. Refuge House Watergate Row South Chester, CH1 2LE				
Aceto Agricultural Chem. Corp. MX, S.de R.L. de C.V.	Michael Feinman	President	6934 Woodmore Terrace, Lakewood Ranch, FL, 34202	631-374-4462
Jorge Elliot #12-602	Salvatore Guccione	CEO	6 Ramkay Drive, Fairfield, NJ 07004	201-208-1439
Col. Polanco, Del. Miguel Hidalgo, C.P. 11580 Mexico, D.F.	Douglas Roth	CFO	9 Kimberly Drive, East Northport, NY 11731	631-368-6030
Aceto Ltd. (Bermuda)	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-208-1439
Clarendon House 2 Church Street Hamilton Hall, Bermuda	Douglas A. Roth Susie Grant Malcolm S. Mitchell	VP & Asst. Secretary Secretary Asst. Secretary	9 Kimberly Drive, East Northport, NY 11731 Not Aceto Employees Not Aceto Employees	631-368-6030
Aceto B.V. Jan Lighthartstraat 75 - 2nd Floor 1964 HA Heemskerk, The Netherlands	Jan Van Eis	Managing Director	Antoniestraat 69, Haarlem, 2011CP, The Netherlands	011-31-251-252322
Aceto FineChem GmbH Winterhuder Weg 27 D - 22085 Hamburg, Germany	Gunter Schenkel	CFO	Pinquinweg 17, 22527 Hamburg, Germany	011-49-40-2270260
Aceto France SAS 21 Boulevard Delessert F-75016 Paris France	Philippe Potelle	Managing Director	210 Rue Du Vivier, Beynost, France 01700	011-33-623-06-7443
Aceto Health Ingredients GmbH Winterhuder Weg 27 D - 22085 Hamburg Germany	Gunter Schenkel	Managing Director	Pinquinweg 17, 22527 Hamburg, Germany	011-49-40-2270260
Aceto (Holding) BV Jan Lighthartstraat 75 - 2nd Floor 1964 HA Heemskerk, The Netherlands	Jan Van Eis	Managing Director	Antoniestraat 69, Haarlem, 2011CP, The Netherlands	011-31-251-252322
Aceto Holding GmbH Klettgastrasse 21 D - 79761 Waldshut-Tiengen Germany	Gunter Schenkel	Head Division Controlling	Pinquinweg 17, 22527 Hamburg, Germany	011-49-40-2270260
Aceto (Hong Kong) Limited 8/F United A1-A2 Hoplite Ind. Ctre. 3-5, Wang Tai Road Kowloon Bay Kowloon, Hong Kong	Gary J. Mo	Secretary	138 Qinghai Road, Suite 15A, Shanghai, China, Post Code 200041	011-86-21-6288-0099
Aceto Luxembourg S.a.r.L. 36, rue Emile Mayrisch L-4240 Esch-sur-Alzette	Salvatore Guccione	President	6 Ramkay Drive, Fairfield, NJ 07004	201-208-1439

COMPANY & ADDRESS	OFFICERS	TITLE		
Aceto Pharma GmbH Winterhuder Weg 27 D - 22085 Hamburg Germany	Jurgen Philipps Gunter Schenkel Dr. Stephan Hornmuth Thomas Koch	Vice President Vice President Vice President Vice President	Hoehenweg 7, Moelin, Germany 23879 Pinquinweg 17, 22527 Hamburg, Germany Alfredstr. 61, 20535 Hamburg, Germany Erbsenkamp 11, 22175 Hamburg, Germany	011-49-40-2270260 011-49-40-2270260 011-49-40-2270260 011-49-40-2270260
Aceto Pharma (India) Private Limited 504, Gateway Plaza Central Avenue road, Hiranadani Gardens Powai, Mumbai - 400 076 INDIA	Pradeep Thakur	General Manager	702 , Maitri Abhang Sunil Nagar, Dombivali ( East ) 421201 India	011-91-251 2870605
Aceto Pte Ltd. 350 Orchard Road #16-05 Shaw House Singapore 238868	Pauline Sng Bee Guat	Managing Director	Blk 12 Dover Close East, #19-208, Singapore 130012	011-65-6296-0800
Aceto (Shanghai) Ltd. (name changed from Aceto Pharmaceutical (Shanghai).Ltd eff. 3/1/11) 9/F Jing'an China Tower 1701 Beijing Road West Shanghai, China 200040	Gary J. Mo	Managing Director	138 Qinghai Road, Suite 15A, Shanghai, China, Post Code 200041	011-86-21-6288-0099
Pharma Waldhof GmbH Hansaallee 159 D-40549 Dusseldorf Germany	Gunter Schenkel Dieter Schumann	Vice President Vice President	Pinquinweg 17, 22527 Hamburg, Germany Stefan-Zweig-Weg 4441068 Moenchengladbach	011-49-40-2270260 011-49-(0) 2161-181683
Plexvest Limited 7D Nikou Kranidioti Street (P.O. Box 27838) Tower 4, Suite 302 2411 Engomi, Nicosia (2433 Engomi, Nicosia) Cyprus (phone 35722313339) (fax 35722313346)	No Officers No Officers			

**UPS CampusShip: View/Print Label**

1. **Ensure there are no other shipping or tracking labels attached to your package.** Select the Print button on the print dialog box that appears. Note: If your browser does not support this function select Print from the File menu to print the label.
2. **Fold the printed sheet containing the label at the line so that the entire shipping label is visible.** Place the label on a single side of the package and cover it completely with clear plastic shipping tape. Do not cover any seams or closures on the package with the label. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.

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UPS locations include the UPS Store®, UPS drop boxes, UPS customer centers, authorized retail outlets and UPS drivers.

Schedule a same day or future day Pickup to have a UPS driver pickup all your CampusShip packages.

Hand the package to any UPS driver in your area.

Take your package to any location of The UPS Store®, UPS Drop Box, UPS Customer Center, UPS Alliances (Office Depot® or Staples®) or Authorized Shipping Outlet near you. Items sent via UPS Return Services(SM) (including via Ground) are also accepted at Drop Boxes. To find the location nearest you, please visit the Resources area of CampusShip and select UPS Locations.

**Customers with a Daily Pickup**

Your driver will pickup your shipment(s) as usual.

FOLD HERE

<p style="text-align: right;">1 OF 1</p> <p style="text-align: center;">1.0 LBS LTR</p> <p>MICHAEL DIBILLO 516-627-6000 523 ACEFO CORPORATION 4 TRI HARBOR CT PORT WASHINGTON NY 11050</p> <p><b>SHIP TO:</b> MS. BONNIE HRICZKO US ENVIRONMENTAL PROTECTION AGENCY 2890 WOODBRIDGE AVENUE, MS-211 REMOVAL ACTION BRANCH <b>EDISON NJ 08837-3659</b></p>	<p style="font-size: 2em; font-weight: bold;">NJ 089 9-02</p> 	<p style="font-size: 2em; font-weight: bold;">UPS NEXT DAY AIR SAVER 1P</p> <p>TRACKING #: 1Z E06 179 13 9446 5962</p> 	<p style="text-align: center;">BILLING: P/P</p> <p style="text-align: center;">reason for shipment: EPA Response for SBD</p> <p style="text-align: center;">   <small>GS 16.1.04. WNTT80-48.0A 01/2014</small> </p>
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## SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Aceto  
4 Tri Harbor Ct.

Port Washington, NY 11050

Attn: Salvatore Guccione, President

21 JAN 12:31 PM

2. Article Number

(Transfer from service label)

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

x *R. Guccione*  Agent  
 Addressee

B. Received by (Printed Name)

*R. Guccione*

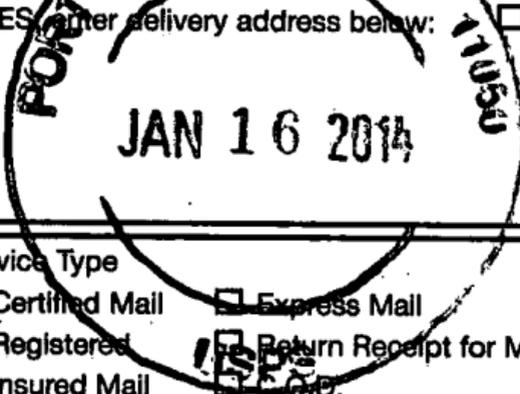
C. Date of Delivery

*1/16*

D. Is delivery address different from item 1?

 Yes

If YES, enter delivery address below:

 No


3. Service Type

 Certified Mail

 Express Mail

 Registered

 Return Receipt for Merchandise

 Insured Mail

 COD

4. Restricted Delivery? (Extra Fee)

 Yes

7012 1640 0001 8519 2647

UNITED STATES POSTAL SERVICE



First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Bonnie Hriczko  
U.S. Environmental Protection Agency  
Removal Action Branch-(MS-211)  
Building 205  
2890 Woodbridge Avenue  
Edison, New Jersey 08837-3679

